

EXHIBIT 4

***UNREDACTED VERSION
OF DOCUMENT SOUGHT
TO BE SEALED***

EXHIBIT 4

Vu, Hong-An

From: Vu, Hong-An
Sent: Thursday, August 03, 2017 9:30 PM
To: 'Jeff Nardinelli'; James Baker
Cc: 'John Cooper'; Brun, Shane; 'Gonzalez, Arturo J.'; 'Yang, Michelle C.Y.'; QE-Waymo; 'BSF_EXTERNAL_UberWaymoLit@bsfllp.com'; 'UberWaymoMoFoAttorneys'; Chatterjee, Neel; Schuman, Brett; Walsh, Rachel M.; 'Matthew Cate'; 'nbartow@uber.com'; 'Aaron Bergstrom (abergstrom@uber.com)'; DG-GP Otto Trucking Waymo
Subject: RE: Waymo v. Uber - Defendants Uber and Ottomotto's Second Set of RFPs - meet and confer requested
Attachments: 170803 Documents Referenced in Gudjonsson Deposition.docx

Counsel and John,

We have tried in good faith to locate the documents referenced in the Gudjonsson deposition and have been able to narrow some of the categories of the list. However, we still do not believe that a majority of the materials we identified have not been produced, in particular, a number of log files reviewed and relied on by Gudjonsson and Gary Brown in their investigation and communications about the investigation. We renew our requests for these materials.

For SVN, [REDACTED] logs, we are willing to narrow our requests to the logs for Anthony Levandowski's computers—including [REDACTED]. We also can narrow our request for these logs to logs relating to the activities of twenty-five engineers on the Chauffeur team [REDACTED]. The engineers should include Pierre-Yves Droz and Gaetan Pennecot but otherwise can be a random sampling as long as we can review the sampling methodology in advance to make sure that it is a fair sampling.

On the Google Drive activity logs or information, we defer to Waymo's discussions with Max Pritt.

For other types of logs, we are comfortable with Waymo producing logs only for Anthony Levandowski, Radu Raduta, and Sameer Kshirsagar at this time.

We look forward to receiving Waymo's identification of the privilege log entries that pertain to any of these identified documents that are being withheld for privilege. As stated on the call, the deposition of Gary Brown is on August 8 and the requested information is relevant to his investigation of Antony Levandowski's computers. As such, we request that Waymo provide the requested information regarding privilege tomorrow and the requested documents over the weekend so that we can prepare for that deposition.

Thank you,

Hong-An

Hong-An Vu



Goodwin Procter LLP
601 South Figueroa Street
Los Angeles, CA 90017
o +1 213 426 2557
f +1 213 289 7728
HVu@goodwinlaw.com | goodwinlaw.com

Documents Referenced in Gudjonsson Deposition on July 28, 2017

[illegible]

[illegible]

